

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13:

MARY JUNITA JONES

CASE NO. 24-00337- JAW

**TRUSTEE'S OBJECTION TO
DEBTOR'S MOTION TO ALLOW PAYMENT ARREARAGES**

COMES NOW, Kellie Grizzell on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee in the above cause and files this Objection to Debtor's Motion to Allow Payment Arrearages (Docket #40), and in support thereof, would show unto the Court the following:

1. The Debtor's Motion requests that the plan payment arrearages be amortized, including the mortgage payments with plan payments to resume in August 2025.
2. The Debtor has completed sixteen (16) of sixty (60) plan months.
3. The Trustee last received a full plan payment in April 2025.
4. The Trustee last received a partial plan payment in June 2025.
5. The Debtor's plan is four (4) months in arrears and delinquent (\$9,683.00).
6. The Trustee filed a Motion to Dismiss Debtor for Non-Payment on October 21, 2024 (Docket #29) and the Debtor filed a Motion to Allow Payment Arrearages (Docket #31) on October 25, 2024. An Agreed Order Denying the Trustee's Motion to Dismiss was entered on December 2, 2024 (Docket #36). As a result, the Debtor's plan delinquency was amortized over the remaining life of the plan. Also, the Court ordered that should the Debtor(s) become more than sixty (60) days delinquent in Chapter 13 plan payments, calculated from the first day of the first delinquent month, the case may be dismissed, without further notice or hearing.

7. The Debtor should be required to submit a good faith payment in the amount of \$1,830.50, to reduce the arrearage to be amortized over the remaining life of the plan.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Objection be received and filed and at the hearing hereon, an Order be entered denying the Debtor's Motion to Allow Payment Arrearages, or in the alternative, should the Debtor's Motion be granted, the Trustee prays that the Debtor be required to (1) submit a good faith payment in the amount of \$1,830.50 to reduce the arrearages to be amortized over the life of the plan and (2) that upon receipt of payment, the wage order be adjusted to increase the plan payments to cure the arrearages and amortize the delinquency; and any general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: July 24, 2025

Respectfully Submitted,

/s/ Kellie Grizzell
Kellie Grizzell, MSB# 105681
Staff Attorney for
Standing Chapter Thirteen Trustee
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CERTIFICATE OF SERVICE

I, Kellie Grizzell, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Objection to the following, by electronic, ECF filing, and/or mail to: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

Attorney for Debtor:

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DATED: July 24, 2025

/s/Kellie Grizzell
Kellie Grizzell